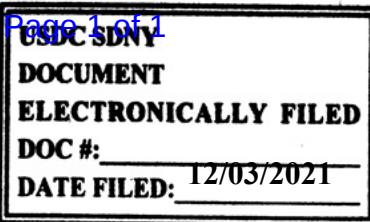


WALTER M. COLLERAN (1912-1998)
RICHARD L. O'HARA
JOHN F. MILLS (1939-2003)
EDWARD J. GROARKE
CHRISTOPHER P. O'HARA
CAROL O'ROURKE PENNINGTON
DENIS A. ENGEL
JOHN S. GROARKE*
MICHAEL D. BOSSO

STEPHANIE SUAREZ
STEVEN C. FARKAS
THOMAS P. KEANE*
DAMIEN O. MAREE*
TAYLOR ANNE WAITT
GARRETT J. DOWD
PATRICIA L. BOLANI
GLENN A. KREBS +



+ OF COUNSEL

December 3, 2021

VIA ECF

Katharine H. Parker
U.S. Magistrate Judge
U.S. District Court
500 Pearl Street, Room 750
New York, NY 10007

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.

12/03/2021

Re: Trustees of the Sheet Metal Workers' Local Union No. 28
Funds and Plans, *et al.* v. Bo Guards Mechanicals LLC
Case: 21-CV-01868-PAE-KHP

Dear Judge Parker:

This firm is counsel to Plaintiffs, Trustees of the Sheet Metal Workers' Local Union No. 28 Funds and Plans, *et al.* ("Plaintiffs"), in the above-captioned matter. Please accept this letter as Plaintiffs' request to postpone the deadline to file the Memorandum of Law in Support of the Inquest currently due on Monday, December 6, 2021.

Due to unexpected technical issues with our office's computer systems, we have been unable to prepare the documentation necessary for the Memorandum. We believe that extending the deadline to Monday, December 13th will enable Plaintiffs to complete the filing.

This is the first request to postpone the deadline. Defendant, Bo Guards Mechanicals LLC, has not consented to the adjournment request; Defendant is in default and did not object to Plaintiffs' application for damages by October 4, 2021 in accordance with Your Honor's Order dated July 19, 2021.

Plaintiffs thank Your Honor in advance for Your consideration of these requests.

Respectfully,

COLLERAN, O'HARA & MILLS L.L.P.

By: /s/ Thomas P. Keane

THOMAS P. KEANE

cc: Bo Guards Mechanicals LLC *via* First Class Mail
1481 Washington Avenue, Suite 13D
Bronx, NY 10456
COM# 2805-0154